

For Six Month Period Ending **December 4, 1990**

(Insert date)

Name of Registrant

ARNOLD & PORTER

Registration No.

1750

Business Address of Registrant

**1200 New Hampshire, N.W.
Washington, D.C. 20036**

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: **N/A**

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

N/A

RECEIVED
DEPT. OF JUSTICE
CRIMINAL DIVISION
JAN 18 4:25 PM '91
INTERNAL SECURITY
SECTION 4

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name

Position

Date Connection
Ended

**Patrick F.J. Macrory
Sukhan Kim**

**Partner
Partner**

**June 12, 1990
August 14, 1990**

In addition, Samuel Flax, Vivian Berzinski, Deborah Prutzman, Robert Rosenbaum, William W. Vodra, David R. Kentoff, Norman Sinel, and Scott B. Schreiber, who have previously filed Short Form Registration Statements, are not rendering services to any of Registrant's foreign principals. These Short Form registrations are hereby terminated.

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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See Attachment No. 1

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☒ */

If yes, identify each such person and describe his services.

***/ However, Richard Wertheimer, Vijay S. Tata, and Michael Sohn, who became partners during earlier periods, began to render services to foreign principals during this period.**

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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See Attachment No. 2

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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See Attachment No. 3

II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

See Attachment No. 4

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

See Attachment No. 5

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment No. 6

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 7

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 8

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

N/A

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
See Attachment No. 9			

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
N/A			

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
See Attachment No. 10			

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
N/A				

(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
*/ See Attachment No. 11			

*/ See Attachment No. 11

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

N/A

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N/A

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: **N/A**

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: **N/A**

- ☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda: **N/A**

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? **N/A** Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ **N/A**

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? **N/A** Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐
 Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of the Republic of Panama</u>			
Various	Xerox Corporation	Duplicating	\$ 11.50
Various	C&P Telephone	Telephone	10.70
Various	New York Telephone	Telephone	1.14
Various	A&P Employees	Local Transportation	41.00
6/20/90	Mintz, Levin, Cohen Ferris, Glovsky & Popeo	Professional Services fees	1,619.50
10/15/90	Research Information Service	Professional Services fees	106.95
10/24/90	Research Information Services	Document Retrieval	64.95
		TOTAL	\$ 1,855.74
<u>Komatsu Ltd.</u>			
Various	Xerox Corporation	Duplicating	\$ 49,500.63
10/09/90	Nightrider Overnite Copy Services	Duplicating	1,465.98
Various	C&P Telephone	Telephone	3,212.71
Various	U.S. Postal Service	Postage	102.33
Various	A&P Employees	Local Transportation	1,600.31
Various	A&P Employees	Cash Expenses	9,128.76
09/13/90	Andrews Office Products	Office Supplies	13.08
10/12/90	Lanier Business Products	Office Supplies	72.00
Various	Federal Express	Courier	835.41
Various	DHL Airways	Courier	471.00
Various	Falcon Express	Courier	525.55
Various	World Courier	Courier	2,441.00
10/24/90	United Postal Service	Courier	65.07
Various	A&P Attorneys	Travel Expenses	7,532.38*
Various	APCO Associates	Professional Service fees	2,188.88
	Three Lafayette Centre 1155 21st Steet, N.W., Suite 1000 Washington, D.C. 20036		
11/20/90	Witherspoon, Kelley, Davenport & Toole	Professional Service fees	8,969.19

(Attachment No. 10 continued on following page)

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties and interviews of witnesses in connection with litigation, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Komatsu Ltd. (Cont.)</u>			
Various	CT Corporation	Professional Service fees	485.00
06/29/90	Ogilvy & Mather Public Affairs	Professional Service fees	4,246.98
	1901 L Street, N.W., Suite 320 Washington, D.C. 20036-3540		
Various	John Whitman	Professional Service fees	2,204.27
09/24/90	Powell Adams & Rinehart	Professional Service fees	19,315.19
10/16/90	Environ Corporation	Professional Service fees	47,332.88
10/31/90	Soller, Singer, & Horn	Professional Service fees	1,100.00
Various	Capitol District Information	Document Retrieval	193.55
07/13/90	Prentice Hall Corporation	Document Retrieval	235.00
08/15/90	Thomson & Thomson	Document Retrieval	540.00
Various	Lexis	Computer Research	1,887.06
Various	Westlaw	Computer Research	385.20
		TOTAL	\$ 166,049.41

(Attachment No. 10 is continued on following page.)

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Venezuela, Gov't of</u>			
Various	Xerox Corporation	Duplicating	\$ 57,987.10
06/26/90	U.S. Dept. of Commerce	Duplicating	1.40
Various	U.S. Postal Service	Postage	57.07
Various	C&P Telephone	Telephone	5,150.54
Various	New York Telephone	Telephone	19,287.10
Various	MCI-Western Union Intl.	Telex	63.97
Various	A&P Employees	Local Transportation	41,844.23
Various	A&P Employees	Cash Expenses	24,699.72
Various	A&P Attorneys	Travel Expense	92,570.66 *
06/27/90	M.S. Ginn's	Office Supplies	68.45
Various	Corporate Furniture Rental	Furniture Rental	2,627.25
Various	Deluxe Delivery Systems, Inc.	Courier	577.00
Various	DHL Airways	Courier	2,284.50
Various	Federal Express	Courier	4,952.15
Various	Falcon Express	Courier	756.13
Various	Apple Courier	Courier	52.65
Various	Network Courier	Courier	330.00
Various	Contemporary Courier	Courier	290.70
Various	Lexis	Computer Research	8,580.14
Various	Westlaw	Computer Research	4,383.00
Various	National News Agency	Publications	537.30
10/18/90	The Association of the Bar of the City of N.Y.	Document Retrieval	35.72
Various	Disclosure, Inc.	Document Retrieval	493.50
06/19/90	Ruesch Intl. McCarthy & Tetrault	Professional Service fees	1,751.32
07/17/90	Legalease, Inc.	Professional Service fees	49.50
06/25/90	Temporary Time Capital Corp.	Professional Service fees	784.00
Various	Joseph T. Maloney Associates	Professional Service fees	11,782.36
Various	CT Corporation Systems	Professional Service fees	165.50
10/31/90	Wire to Law Debenture trust Corp. - London	Professional Service fees	341.55
10/31/90	Slaughter and May (London and New York)	Professional Service fees (Legal Service)	<u>160,868.00</u>
		TOTAL	\$ 443,372.51

(Attachment No. 10 continued on following page)

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Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion Colombiana de Exportadores de Flores (Asocolflores)</u>			
Various	Xerox Corporation	Duplicating	\$ 19,820.01
Various	U.S. Department of Commerce	Duplicating	6.00
Various	CPC Reprographics	Duplicating	731.68
Various	C&P Telephone	Telephone	930.81
Various	U.S. Postal Service	Postage	78.89
Various	MCI-Western Union Intl.	Telex	6.63
Various	A&P Employees	Local Transportation	912.30
Various	A&P Employees	Cash Expenses	1,421.58
Various	Lexis	Computer Research	3,262.96
Various	Westlaw	Computer Research	138.60
Various	A&P Attorneys	Travel Expense	12,326.16*
Various	Federal Express	Courier	41.75
Various	DHL Airways	Courier	1,767.50
Various	Falcon Express	Courier	1,415.80
08/08/90	Apple Courier Incorporated	Courier	19.25
07/31/90	Colombian Consulate	Authentication Fee	6.00
09/10/90	Ann Riley & Associates	Depositions and Transcripts	55.00
06/12/90	Moffitt Reporting Associates	Depositions and Transcripts	212.50
06/15/90	U.S. Court of Int'l. Trade	Filing Fees	120.00
Various	M.S. Ginns	Office Supplies	85.39
Various	Soft Warehouse	Office Supplies	559.85
Various	Research Information Service	Document Retrieval	506.00
Various	APCO Associates	Professional Service fees	7,043.40
	Three Lafayette Centre		
	1155 21st Street, N.W., Suite 1000		
	Washington, D.C. 20036		
Various	Devillier Communications, Inc.	Professional Service fees	5,639.19
	1511 K Steet, N.W., Suite 1100		
	Washington, D.C. 20005		
11/29/90	DC Bar Inter-American Affairs	Professional Service fees	10.00
Various	ICF Consulting	Professional Service fees(Technical Consulting Services)	103,976.39
06/29/90	Robert E. Litan	Professional Service fees	10,872.00
		TOTAL	\$ 171,965.64

(Attachment No. 10 continued on following page)

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Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Hyundai Motor Company</u>			
Various	Xerox Corporation	Duplicating	\$ 41.00
Various	C&P Telephone	Telephone	33.09
Various	A&P Employees	Cash Expenses	132.88
Various	APCO Associates	Professional Service	
	Thre Lafayette Centre	fees	<u>938.50</u>
	1155 21st Street, N.W., Suite 1000		
	Washington, D.C. 20036		
TOTAL			\$ 1,145.47
<u>Government of Chile</u>			
Various	Xerox Corporation	Duplicating	\$ 2,701.50
Various	A&P Employees	Local Transportation	16.80
Various	A&P Employees	Cash Expenses	12.00
Various	Lexis	Computer Research	722.41
11/21/90	Federal Express	Courier	23.25
11/30/90	Falcon Express	Courier	13.70
Various	A&P Attorneys	Travel Expense	<u>3,046.43</u>
TOTAL			\$ 6,536.09
<u>Intl. Comm. Clearing House, Ltd.</u>			
Various	Xerox Corporation	Duplicating	\$ 30.00
06/19/90	U.S. Postal Service	Postage	6.42
07/23/90	Contemporary Courier	Courier	7.90
10/25/90	CT Corporation	Professional Service	
		fees	<u>307.00</u>
TOTAL			\$ 351.32
<u>Asociacion Venzolana de Productores de Cementos</u>			
Various	Xerox Corporation	Duplicating	\$ 416.50
Various	C&P Telephone	Telephone	31.46
11/09/90	U.S. Postal Service	Postage	5.66
08/16/90	Federal Express	Courier	9.00
Various	Falcon Express	Courier	20.75
Various	Lexis	Computer Research	1,032.96
Various	APCO Associates	Professional Service	
	Three Lafayette Centre	fees	
	1155 21st Street, N.W., Suite 1000		
	Washington, DC 20036		<u>22,473.53</u>
TOTAL			\$23,989.86

(Attachment No. 10 continued on following page)

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Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Sural Ca.</u>			
Various	Xerox Corporation	Duplicating	\$ 10,408.57
07/03/90	Clerk of the Court of Intl. Trade	Duplicating	79.00
Various	C&P Telephone	Telephone	1,172.71
Various	New York Telephone	Telephone	2.91
Various	U.S. Postal Service	Postage	80.30
Various	A&P Employees	Local Transportation	773.33
Various	A&P Employees	Cash Expenses	779.90
Various	A&P Attorneys	Travel Expense	2,510.73*
Various	Federal Express	Courier	655.36
Various	DHL Airways	Courier	303.00
Various	Falcon Express	Courier	967.70
Various	Apple Courier	Courier	44.00
Various	Lexis	Computer Research	5,620.94
Various	Westlaw	Computer Research	165.60
09/10/90	George Mason University	Document Retrieval	19.50
10/23/90	Research Information Service	Document Retrieval	79.21
09/21/90	Court of Intl. Trade	Document Retrieval	103.00
10/24/90	U.S. Government Printing Office	Publications	27.00
07/11/90	Wyatt, Tarrant & Combs	Professional Service fees	9,425.52
10/03/90	Ruesch Int'l.	Professional Service fees	1,598.33
10/24/90	M D Traductores Tecnicos	Professional Service fees	67.62
08/30/90	APCO Associates	Professional Service fees	627.25
	Three Lafayette Centre		
	1155 21st Street, N.W., Suite 1000		
	Washington, D.C. 20036		
		TOTAL	\$ 35,511.48

(Attachment No. 10 continued on following page)

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Attachment No. 11

15(c). Disbursements-Political Contributions

During this 6-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things or value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

☒ Yes

☐ No^{*/}

^{*/} However, the following persons who have filed Short-Form Registration Statements have made political contributions in connection with elections for federal offices:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
NANCY ABRAMOWITZ			
6/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
WILLIAM BAER			
6/15/90	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 125.00	Arnold & Porter Partners PAC	Various
PAUL BERGER			
6/15/90	\$ 250.00	Garvey for Senate	Ed Garvey
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
7/11/90	\$ 100.00	Barbara Lett Simmons for Congress	Barbara Simmons
7/30/90	\$ 100.00	Citizens for Sterling Tucker	Sterling Tucker
9/11/90	\$ 50.00	Ed Norton/Ad in NY Times	E.H. Norton
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/16/90	\$ 250.00	Dick Swett for Congress	Dick Swett
11/7/90	\$ 250.00	Friends of Jim Moody	Jim Moody

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>VIVIAN BERZINSKI</i>			
6/15/90	\$ 85.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 85.00	Arnold & Porter Partners PAC	Various
<i>PETER BLEAKLEY</i>			
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>SARAH BLOOM</i>			
12/2/90	\$ 100.00	Campaign to Elect Bernie Sanders	Bernie Sanders
<i>BROOKSLEY BORN</i>			
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/7/90	\$ 200.00	Citizens for Eleanor Holmes Norton	Eleanor Holmes Norton
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/21/90	\$ 250.00	Voters for Choice	Various
<i>WILLIAM BUSIS</i>			
9/7/90	\$ 100.00	Harvey Gantt for U.S. Senate	Harvey Gantt
<i>HOWARD CAYNE</i>			
6/15/90	\$ 95.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 95.00	Arnold & Porter Partners PAC	Various
<i>JUN CHO</i>			
6/10/90	\$ 300.00	Hal Daub for Senate	Hal Daub
<i>WHITNEY DEBEVOISE</i>			
6/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
<i>JAMES DOBKIN</i>			
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
A. PATRICK DOYLE			
6/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
DOUGLAS DWORKIN			
6/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
THOMAS DWYER			
10/8/90	\$ 100.00	Singleton '90	Singleton
10/15/90	\$ 100.00	Hark Brown for U.S. Senate	Hark Brown
MICHAEL FABER			
9/90	\$ 25.00	Committee to Elect Harvey Gantt	Harvey Gantt
JAMES FITZPATRICK			
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/8/90	\$ 100.00	Keep Kastenmeier in Congress	Bob Kastenmeier
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
10/30/90	\$ 250.00	Committee for Congressman Bill Green	Bill Green
SAMUEL FLAX			
6/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
LARRY FREEDMAN			
9/90	\$ 50.00	Harvey Gantt for Senate	Harvey Gantt
10/90	\$ 50.00	Tom Andrews for U.S. House	Tom Andrews
MATTHEW FRUMIN			
9/90	\$ 100.00	Harvey Gantt for Senate	Harvey Gantt
MELVIN GARBOW			
6/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>LAUREN GILBERT</i> 11/1/90	\$ 20.00	Campaign to Elect Harvey Gantt to the Senate	Harvey Gantt
<i>JOSEPH GUTTENTAG</i> 6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/6/90	\$ 500.00	Levin for Senate	Carl Levin
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>RICHARD HUBBARD</i> 6/15/90	\$ 200.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 200.00	Arnold & Porter Partners PAC	Various
<i>ROBERT J. JONES</i> 6/15/90	\$ 100.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 100.00	Arnold & Porter Partners PAC	Various
<i>HADRIAN KATZ</i> 6/15/90	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 125.00	Arnold & Porter Partners PAC	Various
<i>ABE KRASH</i> 6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>MICHAEL A. LEE</i> 6/15/90	\$ 105.00	Arnold & Porter Partners PAC	Various
9/1/90	\$ 25.00	North Carolina Democratic Party	Various
9/15/90	\$ 105.00	Arnold & Porter Partners PAC	Various
10/30/90	\$ 25.00	Harvey Gantt for Senate	Harvey Gantt
<i>KENNETH LETZLER</i> 6/15/90	\$ 200.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 200.00	Arnold & Porter Partners PAC	Various
<i>ELIZABETH LOEB</i> 8/13/90	\$ 100.00	Harvey Gantt	Harvey Gantt
8/14/90	\$ 100.00	Paul Simon	Paul Simon

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>CATHERINE COLLINS MCCOY</i>			
6/15/90	\$ 96.66	Arnold & Porter Partners PAC	Various
9/15/90	\$ 96.66	Arnold & Porter Partners PAC	Various
<i>ROBERT MANNION</i>			
6/15/90	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 125.00	Arnold & Porter Partners PAC	Various
<i>KAREN MEYER</i>			
6/20/90	\$ 25.00	Feminist Majority Foundation	Various
7/2/90	\$ 25.00	Democratic National Committee	Various
9/6/90	\$ 50.00	Harvey Gantt for U.S. Senate	
10/11/90	\$ 25.00	Andrews for Congress	Andrews
<i>MICHAEL MIERZEWSKI</i>			
6/15/90	\$ 95.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 95.00	Arnold & Porter Partners PAC	Various
<i>NANCY MINTZ</i>			
6/15/90	\$ 162.50	Arnold & Porter Partners PAC	Various
9/15/90	\$ 162.50	Arnold & Porter Partners PAC	Various
<i>BRUCE MONTGOMERY</i>			
6/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various
<i>JACK QUINN</i>			
6/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>CLAIRE READE</i>			
6/15/90	\$ 105.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 105.00	Arnold & Porter Partners PAC	Various
<i>DANIEL REZNECK</i>			
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>WILLIAM ROGERS</i>			
8/30/90	\$ 50.00	Harvey Gantt for Senate Campaign	Harvey Gantt
6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>SARAH ROSEN</i>			
10/30/90	\$ 30.00	Harvey Gantt for Senate Campaign	Harvey Gantt
<i>ROBERT D. ROSENBAUM</i>			
6/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various
<i>RICHARD SCHIFTER</i>			
6/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 115.00	Arnold & Porter Partners PAC	Various
9/90	\$ 500.00	Sam Gejdenson for Congress	Sam Gejdenson
<i>K. PETER SCHMIDT</i>			
6/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>LAWRENCE A. SCHNEIDER</i>			
6/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
9/8/90	\$ 50.00	Price for Congress Committee	David Price
9/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>SCOTT SCHREIBER</i>			
6/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>CARY SHERMAN</i>			
6/15/90	\$ 100.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 100.00	Arnold & Porter Partners PAC	Various
9/16/90	\$ 100.00	Milden for Congress	Ally Milden
<i>NORMAN SINEL</i>			
6/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 225.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
JEFFREY SMITH 6/15/90	\$ 133.34	Arnold & Porter Partners PAC	Various
MICHAEL STOSSER 10/6/90	\$ 150.00	Human Rights Campaign Fund	Various
MARK STUMPF 6/15/90	\$ 175.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 175.00	Arnold & Porter Partners PAC	Various
STEVEN G. TEPPER 6/15/90	\$ 62.50	Arnold & Porter Partners PAC	Various
9/15/90	\$ 62.50	Arnold & Porter Partners PAC	Various
DANIEL WALDMAN 6/15/90	\$ 95.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 95.00	Arnold & Porter Partners PAC	Various
KATHLEEN WALLMAN 6/19/90	\$ 250.00	Harvey Sloane Committee	Harvey Sloane
6/22/90	\$ 250.00	Feighan for Congress	Edward Feighan
RICHARD WERTHEIMER 6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
ROBERT WINTER 6/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/90	\$ 250.00	Arnold & Porter Partners PAC	Various

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No xx

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No xx*/

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Wm. D. Rogers Signature January 17, 1991 Date

William D. Rogers

Please type or print name of signatory on the line above

Partner

Title

INTERNAL SECURITY
SECTION
REGISTRATION UNIT
RECEIVED
DEPT. OF JUSTICE
CRIMINAL DIVISION
JAN 18 P 4 25
JAN 17 1991

*/ The Registrant did not disseminate any of the types of material listed in question 2; however, the Registrant did send individual letters to a few government officials.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

N/A

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Wm. D. Rogers

William D. Rogers

Subscribed and sworn to before me at Washington, D.C.

this 17th day of January, 19 91

Arthur P. Henderson
(Signature of notary or other officer)

Not Commission Expires August 14, 1991

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

Attachment No. 1

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
Causton Toney	1310 Locust Road, N.W. Washington, DC 20012	USA	Partner	11/12/90

Attachment No. 2

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Position or Connection</u>	<u>Date Terminated</u>
Paul Alpuche	Associate	June 8, 1990
Enrique Carrasco	Associate	June 15, 1990
Spencer Griffith	Associate	June 12, 1990
Wayne Holcombe	Associate	October 24, 1990
Andrew Shoyer	Associate	August 17, 1990

In addition, Karen Meyer, Sarah Rosen, Christopher Yukins, Michael Stosser, Jun Cho, and Kathleen Wallman, who have previously filed Short-Form Registration Statements, are not rendering services to any of Registrant's foreign principals. These Short-Form Registration Statements are hereby terminated.

Attachment No. 3

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Michael Caglioti	1230 23rd St. NW, #515 Washington, DC 20036	Associate	August 27, 1990
Thomas Carothers	4602 Cheltenham Dr. Bethesda, MD 20814	Associate	Sept. 17, 1990
Joseph Opich	60 W. 66th St., #201 New York, NY 10023	Associate	July 9, 1990

In addition, the following persons, hired previously, began to render services to foreign principals during this period:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Susan Arnold	1001 N. Vermont St. #706 Arlington, VA 22201	Associate	May 8, 1989
James Butler	3211 Oliver St., NW Washington, DC 20015	Associate	November 17, 1986
Margaret Campell	2525 N. 10th St., #708 Arlington, VA 22201	Associate	June 1, 1987
Jack Cleland	3142 Quesada St., NW Washington, DC 20009	Associate	September 8, 1987
Michael Faber	4701 Conn. Ave., NW #307 Washington, DC 20008	Associate	August 31, 1987
George Kaufman	One Harriman's Keep Irvington, NY 10533	Of Counsel	March 19, 1990
James Silk	2413 Drexel St. Vienna, VA 22180	Associate	Sept. 11, 1989
Maya Thomas	5335 42nd Pl., NW Washington, DC 20015	Associate	August 24, 1987
Narges Thomas	2145 Wolftrap Ct. Vienna, VA 22182	Associate	June 4, 1990
Kathleen Wallman	9332 Ramey Lane Great Falls, VA 22066	Associate	January 20, 1987
Sarah Williams	3003 Van Ness St. #S-815 Washington, DC 20008	Associate	Sept. 18, 1989

Attachment No. 4

8. Has your connection with any foreign principal ended during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name of Foreign Principal</u>	<u>Date of Termination</u>
Korean Foreign Trade Association	August 14, 1990
Hyundai Motor Company	August 14, 1990
Grain and Feed Trade Association	December 4, 1990
Metal Market and Exchange Company Limited	December 4, 1990

Attachment No. 5

9. Have you acquired any new foreign principal during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

Name and Address of Foreign Principal

Date Acquired

Suramerica de Aleaciones Laminadas, C.A. (Sural)
Avenida Francisca de Miranda
Parque Cristal, Piso 9
Apto. 62572, Caracas,
Venezuela

October 1990*

Asociacion Venezolana de Productores
de Cementos
Avenida Venezuela
Edificio Venezuela
50-Piso-El Rosal 1060
Caracas, 1010-A
Venezuela

November 1990**

Government of Chile
Santiago, Chile

November 1990

* Prior to October 1990, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

** Prior to November 1990, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

Attachment No. 6

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Airbus Industrie
Asocolflores
Banco Central do Brasil
British American Arts Association (U.K.) Ltd.
Government of Aruba
Government of Brazil
Government of Canada
Government of the Republic of Panama
International Commodities Clearing House, Ltd.
(known also as The London Futures and
Options Exchange)
Joint Exchange Committee
Komatsu Ltd.
Profilo Holding A.S.
Republic of Venezuela
State of Israel
The International Petroleum Exchange of London
Limited
The London Commodity Exchange (1986) Limited
(known also as The London Futures and Options
Exchange)
The London International Financial Futures
Exchange Ltd.

Attachment No. 7

11. During this 6-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement?

☒ Yes

☐ No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Airbus Industrie

No activity.

Asociacion Venezolana de Productores de Cementos

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies and represented the foreign principal in connection with a possible antidumping case against Venezuelan cement exports to the U.S. The Registrant gathered information, met with individuals involved in cement trade, and researched potential strategies with regard to a possible antidumping petition.

Asocolflores

The Registrant rendered advice on to the foreign principal on U.S. laws, regulations, and policies concerning antitrust, intellectual property, licensing, customs, and international trade. The Registrant represented the principal in antidumping and countervailing duty proceedings before the U.S. Department of Commerce and the U.S. Court of International Trade, concerning imports of flowers from Colombia. In addition, the Registrant had telephone conversations regarding the Andean Trade Preference Act that did not constitute political activity with an official of the United States Trade Representative's office and a congressional staff member. The Registrant also met with representatives of the Department of Agriculture with regard to plant inspection requirements.

Banco Central do Brasil/Government of Brazil

The Registrant rendered advice on U.S. laws, regulations, and policies concerning international trade, international banking, investigations by federal banking agencies on behalf of foreign banking authorities, and income taxation. The Registrant also represented the foreign principal with respect to the restructuring of Brazilian external commercial bank debt, including debt for equity swaps. See also response to question 12.

British American Arts Association (U.K.) Ltd.

No activity.

Government of Aruba

No activity.

Government of Canada

The Registrant rendered advice to the foreign principal on GATT issues, on U.S. laws, regulations, and policies relating to the GATT, on U.S. export control laws, and on international trade. See also response to question 12.

Government of Chile

The Registrant rendered advice to the foreign principal on possible claims against the United States government as a result of the 1989 U.S. embargo of Chilean grapes and on the talks between Presidents Bush and Alywin in December 1990.

Government of the Republic of Panama

The Registrant rendered advice on U.S. laws, regulations, and policies concerning banking, the economic relationship between Panama and the U.S., and possible recovery of Panamanian assets. The Registrant also represented the principal in litigation against Bank of Boston International.

State of Israel

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning international trade, foreign debt, securities and finance, property laws, privatization of banks and other companies, Swiss and English banking regulations, foreign foundations' funding of charitable events, taxation, income tax treaty negotiations, U.S. tax treatment of research and development projects, the Tax Convention, corporate law, and U.S. agency programs. In addition, the Registrant rendered advice to Israel Military Industries on U.S. laws, regulations, and policies concerning government procurement, funding, and privatization. The Registrant also rendered advice to the Israel Securities Authority on a proposed Memorandum of Understanding between the Israel Securities Authority and the Securities and Exchange Commission, and on various financing vehicles, including the Import-Export Bank and Agency for International Development, to guarantee housing loans. See also response to question 12.

Hyundai Motor Company

No activity.

***The International Commodities Clearing House, Ltd.,
The International Petroleum Exchange of London Limited,
Joint Exchanges Committee, The London Commodity Exchange (1986)
Limited, The London International Financial Futures Exchange Ltd.***

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning futures and options transactions, markets, and brokers.

The Registrant also rendered advice to The London Commodity Exchange (1986) Limited concerning proposed and current restrictions on trade with Cuba.

Komatsu Ltd.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning antitrust, customs, export controls, securities, corporations, intellectual property, international trade and transactions, including the Exon-Florio Amendment, taxation, tort, product liability, and insurance law. The Registrant also rendered advice to Komatsu's subsidiary, Komatsu Electronic Metals Co. Ltd., regarding environmental, antitrust, employee benefits, taxation, and corporate law with respect to acquisition of the polysilicon and silane gas businesses of Union Carbide Chemicals and Plastics Company Inc. Additionally, in connection with the Union Carbide acquisition, the Registrant assisted Komatsu Electronic Metals Co. Ltd, in the preparation of materials filed with the Committee on Foreign Investment in the United States in the Department of Treasury and had contracts with Department of Treasury officials with regard to the application of the Exon-Florio regulations to such acquisition. Komatsu Ltd. was advised by the Registrant in connection with its participation in Cybermation Cutting Systems, Inc., a U.S. joint venture with Cybermation, Inc. Registrant also had telephone conversations with Department of the Treasury officials with regard to the application of the Exon-Florio regulations to the Komatsu/Cybermation joint venture. See also response to question 12.

Korea Foreign Trade Association

The Registrant rendered advice on U.S. laws, regulations, and policies concerning international trade, and represented the foreign principal in lease negotiations. The Registrant also rendered advice concerning the GATT antidumping code.

Profilo Holding A.S.

The Registrant rendered advice on U.S. laws, regulations, and policies concerning congressional resolutions, the status of executive agreements and proclamations, and U.S. - Turkey relations, and relations between the Turkish and U.S. Jewish communities.

Suramerica de Aleaciones Laminadas, C.A.

The Registrant rendered advice on U.S. laws, regulations, and policies concerning international trade, customs, and finance and represented the foreign principal in antidumping and countervailing duty proceedings with respect to electrical conductor aluminum redraw rod before the U.S. Department of Commerce and the U.S. Court of International Trade, and the U.S. Court of Appeals for the Federal Circuit. Registrant had contact in the course of court and agency proceedings with officials at the U.S. Department of Commerce and the Solicitor General's Office. See also response to question 12.

Republic of Venezuela

The Registrant rendered advice on U.S. laws, regulations, and policies concerning joint ventures, taxation, securities and finance, international trade, and debt reduction, readjustment and rescheduling, including advice on debt negotiations with commercial banks, and the issuance of securities in connection with readjustment and rescheduling of external debt, including rendering advice on obtaining exemptions from the Securities and Exchange Commission and the Commodities Futures Trading Commission. The Registrant also represented the principal with respect to lawsuits in Miami, Florida and New York City in connection with banking and real estate transactions. In connection with the foregoing activities, Registrant had contacts with various U.S. government agencies, World Bank officials, foreign government officials, the New York State Banking Department, and the Wall Street Journal that did not constitute political activity. See also response to question 12.

The Grain and Feed Trade Association

No activity.

Metal Market and Exchange Company Limited

No activity.

Attachment No. 8

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

☒ Yes

☐ No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Banco Central do Brasil/Government of Brazil

On behalf of the foreign principal, the Registrant had telephone conversations with Edwin Yeo, Counsellor to the President, Federal Reserve Bank of New York, on August 22, 23, 24, September 5, 6, 7, 13, 28, October 11, 24, 25, 1990, and held meetings with Edwin Yeo, Counsellor to the President, Federal Reserve Bank of New York, on July 27, August 2, 21, September 6, 24, October 4, 9, 23, November 20, 1990; and extended a written invitation to General Brent Scowcroft, National Security Advisor, on September 5, 1990, for him to meet with two Brazilian Central bank officials. All contacts concerned the restructuring of Brazilian external debt.

Government of Canada

On behalf of the foreign principal, the Registrant had telephone conversations in regard to the Buy America Provision with Edward Cummings, Assistant Legal Advisor, Department of State, on July 2, 1990 and with Jon Etherton, Professional Staff Member, Senate Armed Services Committee, on July 2, 1990.

Komatsu Ltd.

On behalf of Komatsu's subsidiary, Komatsu Electronic Metals Co. Ltd. ("KEM"), the Registrant had a telephone conversation with David Keaney, Staff Director and Chief Counsel of the Subcommittee on Consumer Protection and Competitiveness, House Commerce Committee, on June 6, 1990, and had meetings on June 12, 1990, with David Keaney, Staff Director and Chief Counsel of the Subcommittee on Consumer Protection and Competitiveness, House Commerce Committee and Bruce Gwen, Professional Staff Member, Subcommittee on Consumer Protection and Competitiveness, House Commerce Committee; with Charles Tien, Legislative Assistant, Representative Sikorski's Office; with Evan Williams, Legislative Assistant, Representative Slattery's Office; with Larry Clinton, Legislative Assistant, Representative Boucher's Office. All contracts concern the Exon-Florio Amendment and KEM's acquisition of Union Carbide's polysilicon production facility.

Republic of Venezuela

On behalf of the foreign principal, the Registrant held a meeting with Edwin Yeo, Counsellor to the President, Federal Reserve Bank of New York, on August 13, 1990, regarding Venezuelan external debt restructuring and financing.

The State of Israel

On behalf of the foreign principal, the Registrant had telephone conversations with Shawn Welsh, Agency for International Development, Department of State, on October 19, 1990; with Edward Cummings, Assistant Legal Advisor, Department of State, on October 22, 1990; with Peter Lennon, Professional Staff Member, Senate Appropriations Committee, on October 22, 1990; and held meetings at the Export-Import Bank with M. Solomon, Senior Legal Counsel, Export-Import Bank, Lisa Geberth, Counsel, Export-Import Bank, George Heidrich, Deputy Vice President, Europe and Canada Division, Export-Import Bank, Alice Mayo, Economist, Export-Import Bank and Lyle Ryter, Vice President for Congressional and External Affairs, Export-Import Bank, on August 10, 1990; with Shawn Welsh, Agency for International Development, Department of State, on October 16 and on November 9, 1990, all concerning various financing vehicles to guarantee housing loans.

Suramerica de Aleaciones Laminadas, C.A.

On behalf of the foreign principal, the Registrant, in regard to the appeal of the U.S. Court of International Trade decision pending before the Department of Commerce, had phone conversations and written communications with Perry Plumart, Aide to Congressman Stark, on October 16, 1990; with Elizabeth Gardner, Aide to Senator Heflin, on October 16, 1990; with Janet Nuzum, Staff of House Ways & Means, Trade Subcommittee on October 12, 1990, and had meetings with Julius L. Katz, Deputy U.S. Trade Representative, and Joshua Bolton, General Counsel, U.S. Trade Representative, on October 3, 1990; with Pat Eveland, aide to Congressman Frenzel, on October 4, 1990; and with Janet Nuzum, Staff of House Ways & Means, Trade Subcommittee on October 5, 1990. In addition, the Registrant, on October 12, 1990, sent a cover letter to Julius L. Katz, Deputy U.S. Trade Representative, enclosing press articles regarding the appeal of the Court of International Trade decision pending before the Department of Commerce, and on September 28, 1990 sent a letter to Richard T. McCormack, Under Secretary for Economic and Agricultural Affairs, Department of State, calling to his attention the possible appeal of the Court of International Trade decision.

ATTACHMENT NO. 9

14.(a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

 X Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Venezuela, Gov't of

06/07/90	Venezuela, Gov't of	Fees	\$ 156,882.50
06/07/90	Venezuela, Gov't of	Disbursements	29,486.53
06/22/90	Venezuela, Gov't of	Fees	181,595.00
06/22/90	Venezuela, Gov't of	Disbursements	30,177.14
08/03/90	Venezuela, Gov't of	Fees	246,928.75
08/03/89	Venezuela, Gov't of	Disbursements	45,932.87
08/29/90	Venezuela, Gov't of	Fees	248,683.75
08/29/90	Venezuela, Gov't of	Disbursements	65,361.42
09/06/90	Venezuela, Gov't of	Fees	200,376.25
09/06/90	Venezuela, Gov't of	Disbursements	208,870.30
10/23/90	Venezuela, Gov't of	Fees	257,551.25
10/23/90	Venezuela, Gov't of	Disbursements	<u>31,961.04</u>
		Total Fees	1,292,017.50
		Total Disbs.	411,789.30

The Republic of Panama

07/11/90	Republic of Panama	Fees	\$ 93,898.09
07/11/90	Republic of Panama	Disbursements	6,101.91

Government of Canada

06/18/90	Government of Canada	Disbursements	\$ 228.73
11/15/90	Government of Canada	Fees	10,595.00
11/15/90	Government of Canada	Disbursements	<u>257.94</u>
		Total Fees	10,595.00
		Total Disbs.	486.67

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Korea Foreign Trade Association</u>			
07/24/90	Korea Foreign Trade Assoc.	Fees	\$ 40,658.20
07/24/90	Korea Foreign Trade Assoc.	Disbursements	10,427.23
11/26/90	Korea Foreign Trade Assoc.	Fees	26,220.63
11/26/90	Korea Foreign Trade Assoc.	Disbursements	<u>1,377.37</u>
		Total Fees	66,878.83
		Total Disbs.	11,804.60
<u>Banco Central Do Brasil and Government of Brazil</u>			
08/01/90	Banco Central Do Brasil	Fees	\$ 84,363.25
08/01/90	Banco Central Do Brasil	Disbursements	9,800.37
08/17/90	Banco Central Do Brasil	Fees	5,912.50
08/17/90	Banco Central Do Brasil	Disbursements	4,297.24
08/20/90	Banco Central Do Brasil	Fees	93,399.28
08/20/90	Banco Central Do Brasil	Disbursements	11,079.87
09/24/90	Banco Central Do Brasil	Fees	10,744.25
09/24/90	Banco Central Do Brasil	Disbursements	694.95
11/13/90	Banco Central Do Brasil	Fees	27,373.75
11/13/90	Banco Central Do Brasil	Disbursements	<u>1,123.68</u>
		Total Fees	221,793.03
		Total Disbs.	26,996.11
<u>Profilo Holding, A.S.</u>			
<u>Enka Holding Yatirim, A.S.</u>			
<u>Halk Sigorta T.A.S.</u>			
<u>Sezai Turkes-Feyzi Akkaya Construction Co.</u>			
<u>Tansit Sanayi</u>			
<u>Iktisat Bankasi</u>			
<u>Ak-Pa Tekstil Ihracat Pazarlama, A.S.</u>			
<u>Fentex International Corp.</u>			
06/07/90	Enka Holding	Fees	\$ 10,200.00
06/21/90	Halk Sigorta T.A.S.	Fees	3,600.00
09/14/90	Sezai Turkes-Feyzi Akkaya	Fees	3,600.00
09/17/90	Turkiye Bankasi	Fees	7,200.00
09/20/90	Iktisat Bankasi	Fees	14,400.00
09/27/90	Fentex International	Fees	3,600.00
11/09/90	Enka Holding Yatirim, A.S.	Fees	3,600.00
11/13/90	Iktisat Bankasi Turkes	Fees	3,600.00
11/13/90	Enka Holding	Fees	3,600.00
11/16/90	Turkiye Bankasi	Fees	3,600.00
11/26/90	Turkiye Bankasi	Fees	3,600.00
11/27/90	Halk Sigorta T.A.S.	Fees	7,200.00
11/28/90	Fentex International	Fees	<u>3,600.00</u>
		Total Fees	\$ 71,400.00

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>State of Israel</u>			
06/13/90	State of Israel	Fees	\$ 3,162.37
06/13/90	State of Israel	Disbursements	86.56
08/02/90	State of Israel	Fees	5,000.00
08/02/90	State of Israel	Disbursements	1,212.93
10/25/90	State of Israel	Disbursements	3,664.42
11/30/90	State of Israel	Fees	59,792.55
11/30/90	State of Israel	Disbursements	2,949.26
12/03/90	State of Israel	Fees	45,000.00
		Total Fees	112,954.92
		Total Disbs.	7,913.17
<u>Israel Securities Authority</u>			
08/21/90	Israel Securities Authority	Fees	\$ 18,627.50
08/21/90	Israel Securities Authority	Disbursements	3,446.49
<u>Israel Military Industries</u>			
06/11/90	Israel Military Industries	Fees	\$ 48.73
06/11/90	Israel Military Industries	Disbursements	61.50
07/20/90	Israel Military Industries	Fees	817.50
07/20/90	Israel Military Industries	Disbursements	684.55
07/30/90	Israel Military Industries	Fees	1,033.12
07/30/90	Israel Military Industries	Disbursements	85.25
08/02/90	Israel Military Industries	Fees	2,468.43
08/02/90	Israel Military Industries	Disbursements	456.39
09/14/90	Israel Military Industries	Fees	5,384.98
09/14/90	Israel Military Industries	Disbursements	743.96
11/26/90	Israel Military Industries	Fees	914.04
11/26/90	Israel Military Industries	Disbursements	680.59
		Total Fees	\$ 10,666.80
		Total Disbs.	2,712.24
<u>Asocolflores</u>			
07/03/90	Asocolflores	Fees	\$ 2,900.00
07/03/90	Asocolflores	Disbursements	1,371.63
07/30/90	Asocolflores	Fees	4,550.00
07/30/90	Asocolflores	Disbursements	1,600.25
08/21/90	Asocolflores	Fees	85,898.75
08/21/90	Asocolflores	Disbursements	18,167.07
09/19/90	Asocolflores	Fees	196,306.25
09/19/90	Asocolflores	Disbursements	69,263.33
11/06/90	Asocolflores	Fees	375.00
11/06/90	Asocolflores	Disbursements	77.25
11/26/90	Asocolflores	Fees	47,245.04
11/29/90	Asocolflores	Fees	24,261.25
		Total Fees	361,536.29
		Total Disbs.	90,479.53

Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Airbus Industrie</u>			
09/28/90	Airbus Industrie	Disbursements	\$ 56,280.52
<u>The London Int'l Financial Futures</u>			
08/10/90	London Commodity Exchange	Fees	\$ 200.00
08/10/90	London Commodity Exchange	Disbursements	176.63
		Total Fees	\$ 200.00
		Total Disbs.	176.63
<u>Joint Exchanges Committee</u>			
08/10/90	Joint Exchanges Committee	Fees	\$ 3,200.00
08/10/90	Joint Exchanges Committee	Disbursements	784.57
<u>London Fox</u>			
10/05/90	London Fox	Fees	\$ 21,900.00
10/05/90	London Fox	Disbursements	20,171.84
<u>Sural Ca.</u>			
07/09/90	Sural Ca	Fees	\$ 140,837.50
07/09/90	Sural Ca	Disbursements	20,623.86
10/22/90	Sural Ca	Fees	124,417.50
10/22/90	Sural Ca	Disbursements	11,138.29
		Total Fees	\$ 265,255.00
		Total Disb.	31,762.15
<u>Hyundai Motor Company</u>			
06/27/90	Hyundai Motor Company	Fees	\$ 23,077.50
06/27/90	Hyundai Motor Company	Disbursements	21,737.81
08/22/90	Hyundai Motor Company	Fees	7,140.00
08/22/90	Hyundai Motor Company	Disbursements	2,558.49
10/31/90	Hyundai Motor Company	Fees	8,182.50
10/31/90	Hyundai Motor Company	Disbursements	3,253.38
		Total Fees	\$ 38,400.00
		Total Disb.	27,579.68

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Komatsu Ltd.</u>			
06/11/90	Komatsu Ltd.	Fees	\$ 146,580.00
06/11/90	Komatsu Ltd.	Disbursements	14,723.62
07/10/90	Komatsu Ltd.	Fees	230,800.00
07/10/90	Komatsu Ltd.	Disbursements	40,633.16
07/25/90	Komatsu Ltd.	Fees	29,050.00
07/25/90	Komatsu Ltd.	Disbursements	4,827.43
08/10/90	Komatsu Ltd.	Fees	320,495.00
08/10/90	Komatsu Ltd.	Disbursements	55,134.54
08/29/90	Komatsu Ltd.	Fees	8,969.19
09/06/90	Komatsu Ltd.	Fees	184,520.00
09/06/90	Komatsu Ltd.	Disbursements	20,172.60
09/24/90	Komatsu Ltd.	Disbursements	19,315.19
09/26/90	Komatsu Ltd.	Fees	10,700.00
09/26/90	Komatsu Ltd.	Disbursements	65.81
10/12/90	Komatsu Ltd.	Disbursements	47,332.88
10/19/90	Komatsu Ltd.	Fees	39,145.00
10/19/90	Komatsu Ltd.	Disbursements	13,525.16
12/04/90	Komatsu Ltd.	Fees	32,640.00
12/04/90	Komatsu Ltd.	Disbursements	847.60
		Total Fees	\$ 1,002,899.19
		Total Disb.	216,577.99

ATTACHMENT NO. 10

15.(a) Disbursements -- Monies

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 or 10 of this statement?

 X Yes No

- (2) transmitted monies to any such foreign principal?

 Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

The International Petroleum Exchange of London Limited

Various	Xerox Corporation	Duplicating	\$ 12.00
08/01/90	C&P Telephone	Telephone	.83
		TOTAL	\$ 12.83

Joint Exchanges Committee

08/01/90	C&P Telephone	Telephone	\$ 2.69
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London International Financial Futures Exchange Ltd.

Various	Xerox Corporation	Duplicating	\$ 389.75
Various	C&P Telephone	Telephone	20.89
Various	APCO Associates	Professional Service	
	Three Lafayette Centre	fees	9,976.50
	1155 21st Street, N.W., Suite 1000		
	Washington, D.C. 20036		
07/01/90	Westlaw	Computer Research	18.00
Various	Lexis	Computer Research	617.86
Various	A&P Employees	Local Transportation	87.76
Various	A&P Employees	Cash Expenses	24.00
		TOTAL	\$11,134.76

(Attachment No. 10 is continued on following page.)

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Airbus Industrie</u>			
Various	Xerox Corporation	Duplicating	\$ 62.25
10/02/90	Shearman & Sterling	Professional Service fees	<u>56,280.52</u>
		TOTAL	\$ <u>56,342.77</u>

The State of Israel

Various	Xerox Corporation	Duplicating	6,949.41
06/18/90	Disclosure, Inc.	Duplicating	196.57
08/15/90	U.S. Postal Service	Postage	.65
Various	A&P Employees	Local Transportation	1,778.40
Various	C&P Telephone	Telephone	454.57
Various	New York Telephone	Telephone	837.72
Various	A&P Employees	Cash Expenses	1,417.74
Various	Lexis	Computer Research	2,444.74
07/01/90	Westlaw	Computer Research	63.00
Various	Apple Courier Incorporated	Courier	169.75
Various	Falcon Express	Courier	215.00
Various	Contemporary Courier	Courier	348.40
Various	Deluxe Delivery Systems	Courier	146.50
Various	Overnight For Less	Courier	425.20
Various	Federal Express	Courier	557.00
Various	DHL Airways	Courier	134.00
Various	A&P Attorneys	Travel Expenses	625.69*
08/15/90	Export Import of the United States	Filing Fees	100.00
06/29/90	Bureau of National Affairs	Document Retrieval	59.38
Various	APCO Associates	Professional Service fees	
	Three Lafayette Centre		
	1155 21st Street, N.W., Suite 1000		
	Washington, DC 20036		<u>3,902.75</u>
		TOTAL	\$ <u>20,826.47</u>

(Attachment No. 10 is continued on following page)

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties and interviews of witnesses in connection with litigation, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Israel Military Industries</u>			
Various	Xerox Corporation	Duplicating	\$ 401.75
Various	C&P Telephone	Telephone	34.88
Various	U.S. Postal Service	Postage	9.36
Various	Lexis	Computer Research	1,686.01
Various	A&P Employees	Local Transportation	5.36
Various	A&P Employees	Cash Expenses	209.27
08/14/90	Falcon Express	Courier	19.75
09/10/90	Apple Courier	Courier	5.50
		TOTAL	\$ 2,371.88

British American Arts Association (U.K.) Ltd.

Various	Xerox Corporation	Duplicating	\$ 300.20
Various	C&P Telephone	Telephone	90.10
Various	U.S. Postal Service	Postage	24.96
Various	A&P Employees	Local Transportation	257.79
Various	A&P Employees	Cash Expenses	5.00
Various	A&P Attorneys	Travel Expenses	602.50*
09/28/90	Falcon Express	Courier	5.75
		TOTAL	\$ 1,286.30

Government of Canada

Various	Xerox Corporation	Duplicating	\$ 371.50
Various	C&P Telephone	Telephone	1.40
Various	U.S. Postal Service	Postage	2.50
Various	A&P Employees	Local Transportation	44.40
Various	A&P Employees	Cash Expenses	10.00
Various	Lexis	Computer Research	727.48
Various	Falcon Express	Courier	67.35
		TOTAL	\$ 1,224.63

(Attachment No. 10 is continued on following page)

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties and interviews of witnesses in connection with litigation, and not for Item 12 activities.

Disbursements (Cont.)Korea Foreign Trade Association

Various	Xerox Corporation	Duplicating	\$	2,042.25
Various	C&P Telephone	Telephone		650.09
Various	A&P Employees	Cash Expenses		1,314.43
Various	A&P Employees	Local Transportation		298.30
Various	Apple Courier Incorporated	Courier		37.75
Various	Falcon Express	Courier		221.75
Various	DHL Airways	Courier		96.00
Various	A&P Attorneys	Travel Expense		976.92*
Various	Lexis	Computer Research		237.03
Various	APCO Associates	Professional Service		
	Three Lafayette Centre	fees		<u>1,396.67</u>
	1155 21st Street, N.W., Suite 1000			
	Washington, D.C. 20036			
		TOTAL	\$	7,271.19

Profilo Holding A.S.

Various	Xerox Corporation	Duplicating	\$	882.50
Various	C&P Telephone	Telephone		160.00
Various	New York Telephone	Telephone		35.12
Various	A&P Employees	Local Transportation		1,682.17
Various	A&P Employees	Cash Expenses		1,314.96
Various	A&P Attorneys	Travel Expense		4,419.89*
Various	DHL Airways, Inc.	Courier		82.00
Various	Falcon Express	Courier		24.10
Various	Federal Express	Courier		19.00
Various	APCO Associates	Professional Service		
	Three Lafayette Centre	fees		<u>5,370.49</u>
	1155 21st Steet, N.W., Suite 1000			
	Washington, D.C. 20036			
		TOTAL	\$	13,990.23

(Attachment No. 10 is continued on following page)

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties and interviews of witnesses in connection with litigation, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Banco Central do Brasil</u>			
Various	Xerox Corporation	Duplicating	\$ 7,733.25
Various	U.S. Postal Service	Postage	1.70
Various	C&P Telephone	Telephone	1,738.54
Various	New York Telephone	Telephone	122.38
09/28/90	Western Union Int'l.	Telex	5.34
Various	A&P Employees	Local Transportation	834.51
Various	A&P Employees	Cash Expenses	1,266.64
Various	Falcon Express	Courier	224.30
Various	DHL Airways	Courier	924.00
08/09/90	Archer Services	Courier	82.45
Various	Federal Express	Courier	19.50
Various	Contemporary Courier	Courier	41.70
Various	Apple Courier Incorporated	Courier	90.75
Various	Deluxe Delivery Systems, Inc.	Courier	22.50
07/03/90	CSIS Between Bailout & Breakdown	Publications	9.36
Various	Faxon Company, Inc.	Publications	522.87
Various	National News Agency	Publications	537.30
11/27/90	Stenio A. Schiavo Portuguese Interpreter	Professional Services fees	2,601.00
Various	Research Information Services	Document Retrieval	930.41
08/09/90	Superintendent of Documents	Document Retrieval	10.00
Various	Lexis	Computer Research	2,837.34
Various	A & P Attorneys	Travel Expense	16,185.38*
Various	The Association of the Bar of the City of New York	Document Retrieval	77.40
09/21/90	Brazilian-American Chamber of Commerce, Inc.	Continuing Education	135.00
		TOTAL	\$ 36,953.62

(Attachment No. 10 is continued on following page)

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties and interviews of witnesses in connection with litigation, and not for Item 12 activities.